

# Looking forward

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UST Program Chief

# Looking forward

- \* Changes to technical regulations
  - \* Monthly/annual walkthrough inspections
  - \* Containment sump testing
  - \* Compatibility testing
- \* Consideration of two additional certified contractor classifications
- \* Developing lender liability guidance
- \* Revisions to the Trust Fund regulations

# New Federal UST Regulations

- \* Final and published in July 2015
- \* For Mississippi, we must have the new UST regulations adopted **no later than** July 14, 2018
- \* *Note: many of the changes in the new Federal UST Regulations were adopted by Mississippi in October 2008*

# Major UST Federal Regulation Changes for MS

- \* Monthly walk through inspections
- \* Regulating airport hydrant systems and field constructed tanks
- \* Requiring replacement of all UST piping when 50% or more of the piping is replaced
- \* Elimination of flow through restrictors (ball floats) for overfill prevention
- \* Notification and compatibility requirements for fuel blends > 10% ethanol or >20% biodiesel

# Major UST Federal Regulation Changes (continued)

- \* Allowing the continued use of monitoring wells for groundwater/vapor monitoring as a form of release detection
- \* Addition of lender liability subpart defining UST management responsibilities for lenders prior to and after foreclosure



# Monthly Walk Through Inspections

- \* Check spill buckets and record the findings
- \* While checking release detection monthly, review records and record unusual operating conditions



# Monthly Walk Through Inspections

Time monthly walk through inspections  
with routine release detection  
monitoring

SAVE TIME AND MONEY

# Monthly Walk Through Inspection (spill buckets)

## Do

- \* Remove any liquid and debris
- \* Ensure the metal cover is on the spill bucket
- \* Check the fill cap for tight fit

## Record

- \* Each spill bucket checked
- \* Any liquid/debris removed
- \* Condition of bucket and caps





# \*spill bucket side note

- \* 4 State study found 40% of UST system failures due to spill buckets
- \* National service station chain found 70% of confirmed releases due to spill buckets
- \* 5 year life expectancy



# If you do need to replace your spill bucket make sure:

- ✓ all contaminated backfill material is removed around the spill bucket
- ✓ slightly elevated from the surrounding
- ✓ gaskets are replaced regularly



# Monthly Walk Through Inspection (release detection)

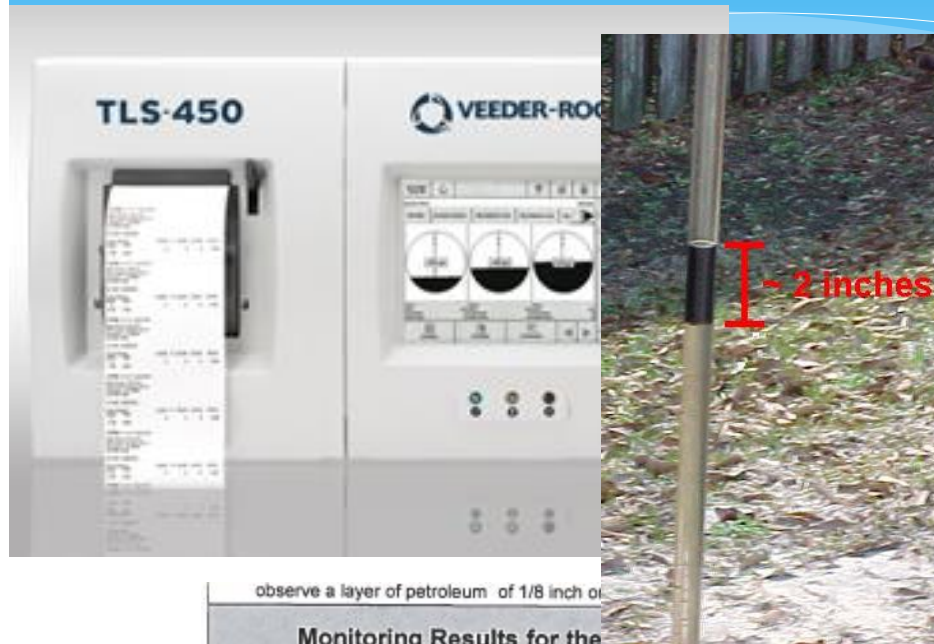
## Do

- \* Check for any alarms
- \* Monthly written records are accurate
- \* Monitor for unusual operating conditions

## Record

- \* Any alarms noted and corrective action
- \* All release detection equipment checked
- \* Report unusual operating conditions and corrective action

# Monthly Walk Through Inspection (release detection)



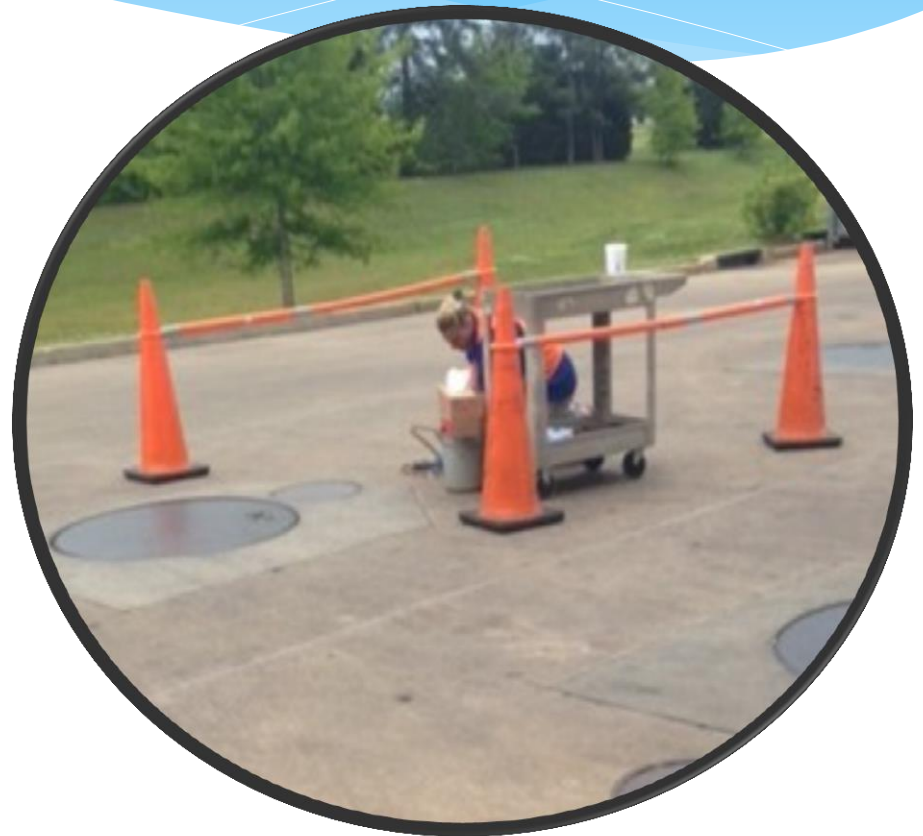
observe a layer of petroleum of 1/8 inch or

Monitoring Results for the				
Monitoring Well Number		1	2	3
GROUND WATER	Approximate depth to top of the water in the well (inches)	82"	84"	90"
	Is there any sheen of the store product on the water? (yes/no)	N	N	N
	Is there any layer of the stored product on the water? (yes/no)	N	N	N
	If there is a layer of the stored product, how thick is it? (inches)	2"	-	-
Vapor reading (record in parts per million)				
Have the vapor readings				

- \* Make sure you have a passing test for each tank and pipe
- \* If  $> 1/8^{\text{th}}$  inch fuel in MW, report it
- \* Elevated vapors are reported
- \* All alarms are reconciled
- \* Sumps are dry

# Annual Walk Through Inspection

- \* All covers present, in good condition, seated firmly
- \* Standard drop tube in good condition
- \* Tank gauge stick can be clearly read, not broken
- \* Check for all monthly and annual records





# Re-defined “replaced”

For piping – to remove 50 percent or more of piping and install other piping, excluding connectors, connected to a single tank



For Mississippi,  $\geq 50\%$  of the piping needs to be replaced,

**ALL** the piping is required to be replaced with double-walled piping

# Ball floats

**No longer allowed for new installations**

**Cannot replace  
existing  
ball floats with new  
ball floats**



# Containment sump TESTING

Right now, we require  
**INSPECTING,**

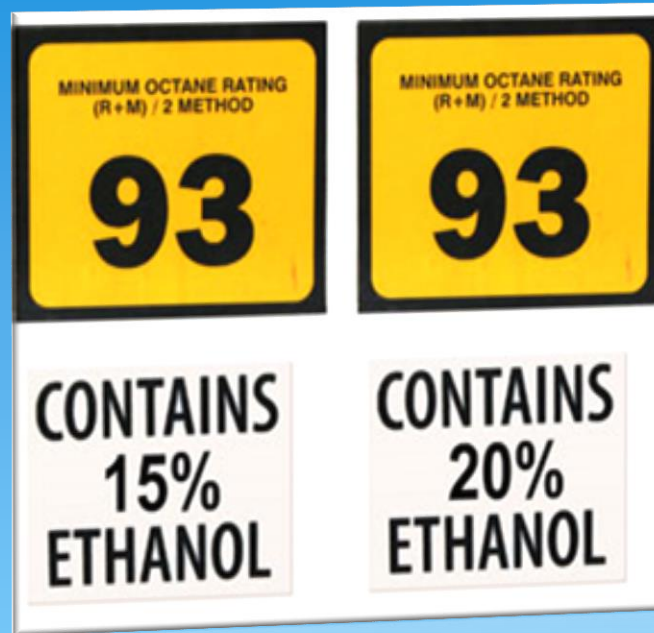
New regulations require 3  
year **TESTING**



# NEW to Regulation



# Notification & compatibility when changing fuel blends



> 10% ethanol

> 20% biodiesel



# Groundwater/Vapor Wells as still allowed!!!

**Some issues being addressed by MDEQ:**

- ❖ Wells not deep enough
- ❖ Background concentrations interfering with monthly readings
- ❖ Not sufficient number of wells
- ❖ Alternate form of release detection if release has occurred

# Lender Liability

New Subpart to the regulations:

- \* Who's responsible prior to foreclosure
- \* Holder's responsibilities after foreclosure
  - \* Empties all UST systems within 60 calendar days of foreclosure
  - \* Permanently Close USTs or meet temporary closure requirements

# FORECLOSURE

# Lender Liability

Holder's responsibilities in temporary closure:

- ❖ Maintain corrosion protection
- ❖ Report suspected releases
- ❖ Conduct site assessment after 12 months of temporary closure if UST system does not meet new UST system standards

# Operator Training

Requires re-training of Class A/B Operators when their UST system is found to be out of compliance

Class A/B Operators



# UST Future Goals

- \* Revised Mississippi Groundwater Protection Trust Fund Regulations by December 2015
- \* Draft UST Certified Contractor Regulations by December 2016
- \* Draft UST Technical Regulations incorporating federal regulations for public comment by March 2017



# UST Certified Cathodic Protection Testers



Adding a new category of UST contractors that have specialized training in cathodic protection testing

# UST Certified Technicians

Specializing in the annual testing requirements:

- \* Spill bucket testing
- \* Overfill prevention monitoring
- \* Sump integrity
- \* Release detection maintenance



# Certified Contractors

Developing a new position for working directly with the certified contractors:

- Ensure compliance
- Monitor test results
- Evaluate difficult locations



# Reducing time to cleanup

Continue to use new technologies to cleanup petroleum contamination faster

Creating ways to expedite the time from the initial report of a release to the finished date of cleanup

Evaluating vapor intrusion concerns



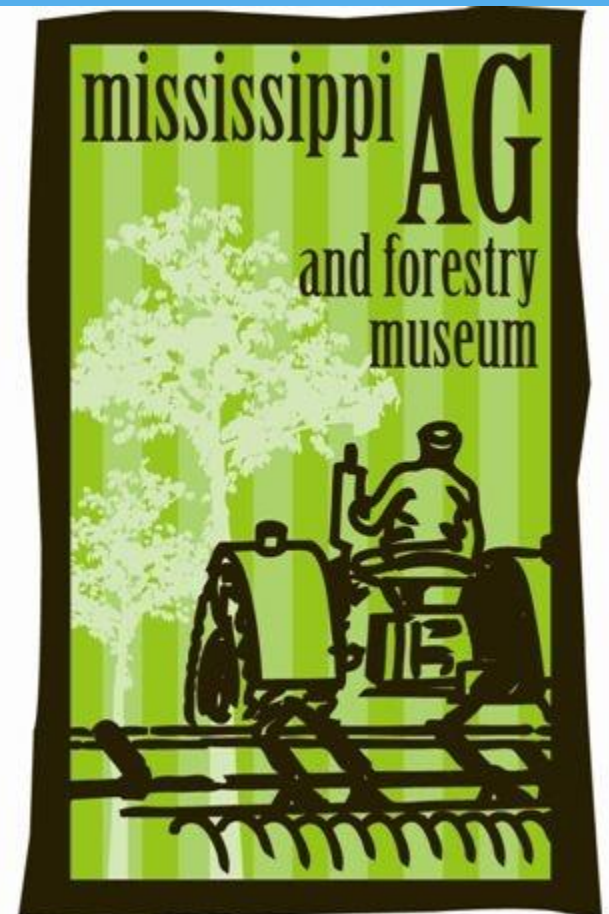
# September 23 & 24, 2015

Ethnic Heritage Center

MS Environmental Response Action Contractor  
(ERAC) Conference

2 full days of training dedicated to:

- MDEQ GARD topics
- Remediation technologies – dual phase extraction, thermal, ozone, surfactant injection
- New assessment and remediation products
- Sonic drilling
- On-site visits to local remediation units
- Remediation case studies
- Groundwater modeling





# UST Compliance Workshop

**November 5, 2015**

MDEQ Main Building  
515 East Amite Street  
Jackson, MS

# Questions?

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